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 ALI EBRAHIMZADEH

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

IRANIAN AMERICANS FOR
 LIBERTY INSTITUTE,

Plaintiff,

vs.

ALI EBRAHIMZADEH, et al.,

Defendants.

) Case No.: 2:22-CV-09240

) **DECLARATION OF ALI**
) **EBRAHIMZADEH IN SUPPORT OF**
) **SPECIAL MOTION TO STRIKE**

) Hearing Date: March 6, 2023
) Hearing Time: 10:00 a.m.
) Location: Courtroom 5A

I, Ali Ebrahimzadeh, declare as follows:

1. I am the named Defendant herein.

2. I have personal knowledge of the truth and accuracy of the facts set forth herein, and if called upon as a witness, I could competently testify thereto. I do not intend to waive the attorney-client privilege or work product doctrine by making any statement herein.

DECLARATION



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1 3. I was born in Iran and immigrated to the United States in 2015. I
2 am an activist that, with other Iranian immigrants, opposes the Iranian
3 Regime and supports the efforts by Iranians to protest and work towards
4 democracy. Among my past activities is the 2021 “Normal Life” campaign,
5 which attracted media attention with a billboard in Manhattan’s Times
6 Square. I also organize the Normal Life Council, a non-profit that raises
7 awareness of human rights abuses in Iran.

8 4. In my work, I have become aware of the statements of other
9 activists and organizations who either claim to or actually promote democracy
10 in Iran. I am familiar with the work and statements by the plaintiff in this
11 matter, Iranian Americans for Liberty Institute (the “Institute.”)

12 5. The Institute seeks to influence American policy towards the
13 government of Iran through advocacy and education. It also seeks to influence
14 United States elections and hosts events supporting national politicians who
15 agree with the Institute. On January 16, 2023, I accessed the Institute’s
16 website and observed that the Institute hosted an event for Senator Rob
17 Johnson on May 10, 2022. Other events for politicians are listed at the
18 website, <https://iranianamericansforliberty.org/pages/events>.

19 6. The Institute’s website describes the Institute as a political action
20 committee that helps elect candidates and influence the outcome of elections.
21 The Institute’s PAC activities are set forth at
22 <https://iranianamericansforliberty.org/pages/how-we-do-it>.

23 7. In December 2021, I was actively monitoring traditional and
24 social media about Iran’s government and those who support and undermine
25 the regime.

26 8. On December 23, 2021, a famous Iranian Activist, Masih Alinejad
27 publicly requested a social media ban for the supreme leader of Iran.



1 9. On December 24, 2021, the Institute issued a statement
 2 pertaining to social media use by the leadership of Iran entitled: The Call for
 3 Censorship by the Big Tech Companies from Activist Journalists is Abhorrent
 4 and Must Be Opposed by All Freedom Loving Americans. A true and correct
 5 copy of that statement is attached hereto and incorporated herein as **Exhibit**
 6 **“1.”** The Institute described Ms. Alinejad’s earlier statements as “a blatant
 7 falsehood to advance a sinister agenda.”

8 10. When the Institute issued a statement opposing calls for a social
 9 media ban for the supreme leader of Iran, I believed then, and believe today,
 10 that the Institute was acting in the interests of the current government of
 11 Iran and to further the free speech rights of that repressive government.

12 11. Any statements I have ever made about the Institute in
 13 connection with Ms. Alinejad or the Institute’s December 24, 2021 statement
 14 about censorship were made with the sincere belief that the Institute’s stance
 15 on the blocking of social media in the United States is, in effect, supporting
 16 the current government of Iran.

17 12. I have read the allegations in the complaint against me. The
 18 complaint alleges in paragraph 38 that Tweet No. 1 which the Institute
 19 attributes to me said in English: “Leave these exported agents to us.” The
 20 original Tweet is not attached to the complaint nor is the original language of
 21 the Tweet pled in the complaint. I am familiar with the Persian version of
 22 that tweet and I saw it posted on Twitter before the account was suspended.
 23 Tweet No. 1 suggested that the Institute’s statement demonstrated that the
 24 Institute was protecting the Iranian supreme leader’s freedom of speech
 25 rights in the United States. Tweet No. 1 used a hashtag, #اپوزيسيون_امنيتي that
 26 means security opposition. The Institute has inaccurately translated those
 27 words to read “intelligence opposition.” The Institute’s translation is wrong.
 28



1 13. I have read the Institute's allegation at paragraph 49 that it has
2 been "*actively excluded by the Persian-speaking media...*" I am familiar with
3 Persian-speaking media as it relates to the pro-democracy activism in Iran. I
4 am unaware of any Persian-speaking media who used any social media post
5 by me to make its decisions regarding exclusion of the Institute.

6 14. I have read the Institute's allegation at paragraph 50 that it has
7 "lost business and professional opportunities, including conference
8 speakerships." I am aware of conference speakerships that arise in the context
9 of Iranian democracy activism. I am unaware of any business or professional
10 opportunities or conference speakerships in the Iranian democracy space that
11 has been lost by the Institute due to any social media post by me.

12 15. I am aware of hundreds of people making public accusations
13 against the Institute similar to what is alleged in the complaint. A
14 compendium of examples of these other similar social media posts by other
15 people is attached hereto and incorporated herein as **Exhibit "2."**

16 I declare under penalty of perjury under the laws of the United States of
17 America that the foregoing is true and correct.

18 Executed this __th day of January 2023, at _____,
19 California.

20
21 
22 _____
23 Ali Ebrahimzadeh
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